

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

-----X
SHEET METAL WORKERS' UNION
LOCAL 19, et al.

-against-

17 CV 0888 (LFS)

STERIS CORPORATION, et al.

-----X

STIPULATION OF SETTLEMENT

IT IS HEREBY Stipulated by and between the undersigned Counsel for the Parties
named herein as follows:

WHEREAS the Parties wish to resolve this matter without the cost and inconvenience of
further litigation;

WHEREAS there has been no adjudication as to the merits of this matter;

WHEREAS all Parties deny any wrongdoing and/or liability to the other;

THEREFORE, the Parties agree as follows:

- 1) Defendants will accept payments for employee contributions to premiums in the ordinary
bi-weekly deduction amount for employer-provided health insurance, as tendered to
Defendants by Plaintiffs or affected employees of Defendants on or about February 24,
2017. If any employee has yet to make such payment, or has paid an incorrect sum, said

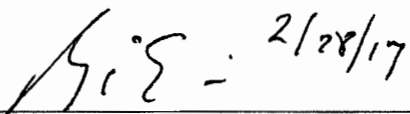
employee may be permitted make payment or correct the amount of the payment made by March 6, 2017. Defendant shall furnish notice of any deficiencies by March 3, 2017.

- 2) Plaintiffs represent that Plaintiff Sheet Metal Workers Union Local 19 is authorized to act on behalf of all of its members who have been on strike against Defendants commencing February 16, 2017 to the present.
- 3) Defendants will reinstate immediately health insurance for the individual Plaintiffs herein and for the affected members of the collective bargaining unit, Sheet Metal Workers Union Local 19, who have been on strike against Defendants since February 16, 2017. Such insurance shall be reinstated retroactively to February 16, 2017 and shall continue through March 10, 2017. Defendants promptly will reissue COBRA notices to all affected individual employees informing them that their employer-paid health insurance coverage will terminate at 12:01 a.m. on March 11, 2017, assuming that the affected individual employees have not returned to work.
- 4) Assuming that the affected individual employees have not returned to work, and assuming compliance with this Order, Plaintiffs, including individual members of the Collective Bargaining Unit represented by Sheet Metal Workers' Union, Local 19, agree they will not contest that a COBRA-qualifying event has occurred, resulting in termination of their employer-paid health insurance as of 12:01 a.m. on March 11, 2017.

- 5) Plaintiffs agree to withdraw the instant Complaint and application for a restraining order.
- 6) Plaintiffs agree to withdraw the Charge Against Employer filed on February 24, 2017 at the United States National Labor Relations Board, Charge No. 04-CA-193765.

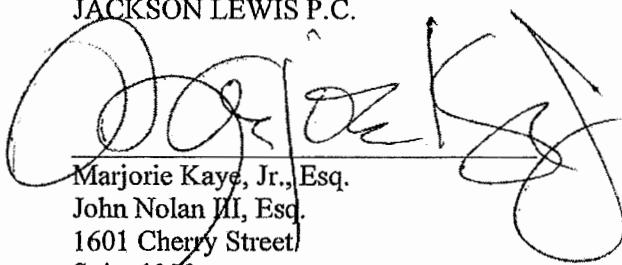
Dated: February 28, 2017
Philadelphia, PA

SPEAR WILDERMAN, PC

 2/28/17

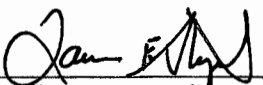
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SO ORDERED:

 3/1/17

Hon. Lawrence F. Stengel
J.U.S.D.C.